

1 Alan M. Fisch (*pro hac vice*)  
alan.fisch@fischllp.com  
2 R. William Sigler (*pro hac vice*)  
bill.sigler@fischllp.com  
3 Adam A. Allgood (SBN: 295016)  
adam.allgood@fischllp.com  
FISCH SIGLER LLP  
5301 Wisconsin Avenue NW  
Fourth Floor  
6 Washington, DC 20015  
Tel: 202.362.3500  
7 Fax: 202.362.3501

8 Ken K. Fung (SBN: 283854)  
ken.fung@fischllp.com  
9 FISCH SIGLER LLP  
400 Concar Drive  
10 San Mateo, CA 94402  
11 Tel: 650.362.8207  
12 Fax: 202.362.3501

13 Counsel for Plaintiffs  
14 Juniper Networks, Inc.  
and Apstra, Inc.

1 Leo R. Beus (*pro hac vice*)  
Michael K. Kelly (*pro hac vice*)  
K. Reed Willis (*pro hac vice pending*)  
BEUS GILBERT PLLC  
Attorneys at Law  
701 North 44th Street  
Phoenix, Arizona 85008-6504  
Telephone: (480) 429-3000  
Facsimile: (480) 429-3001  
Email: lbeus@beusgilbert.com  
mkelly@beusgilbert.com  
rwillis@beusgilbert.com

Allan Steyer (SBN: 100318)  
Suneel Jain (SBN: 314558)  
STEYER LOWENTHAL BOOD-  
ROOKAS ALVAREZ & SMITH LLP  
235 Pine Street, 15th Floor  
San Francisco, California 94104  
Telephone: (415) 421-3400  
Facsimile: (415) 421-2234  
Email: asteyer@steyerlaw.com  
sjain@steyerlaw.com

Counsel for Defendant  
Swarm Technology LLC

18                   **UNITED STATES DISTRICT COURT**  
19                   **NORTHERN DISTRICT OF CALIFORNIA**  
20                   **SAN FRANCISCO DIVISION**

21 JUNIPER NETWORKS, INC. and  
APSTRA, INC.,

22                   Plaintiffs,

23                   v.

24 SWARM TECHNOLOGY LLC,

25                   Defendant.

26 CASE NO. 3:20-cv-03137-JD

**JOINT STIPULATION EXTENDING  
DEADLINES FOR FILING  
RESPONSE AND REPLY TO MOTION  
TO DISMISS**

Pursuant to Civil Local Rules 6-2(a) and 7-12, Plaintiffs, Juniper Networks, Inc. and Apstra, Inc. (collectively “Juniper”), and Defendant, Swarm Technology LLC (“Swarm”), stipulate, subject to the Court’s approval, to extend the deadline for Juniper to file its Response to Swarm’s Motion to Dismiss (Dkt. No. 39) from April 30, 2021 to May 21, 2021 and the date for Swarm to file its Reply in support of its Motion to Dismiss from May 7, 2021 to May 28, 2021. The parties also stipulate, subject to the Court’s approval, that the hearing on Swarm’s motion to dismiss be held on June 10, 2021 at 10:00 am.

The parties respectfully request that the Court extend these deadlines to allow for jurisdictional and venue discovery that Juniper asserts is relevant to the motion to dismiss. The parties have agreed to the following limitations on venue and jurisdictional discovery, which shall be completed by May 14, 2021.

- Three interrogatories related to venue and jurisdictional issues, and
- A four-hour deposition of Swarm’s corporate representative Alfonso Iniguez in his personal capacity and as a 30(b)(6) witness related to venue and jurisdictional issues.

No other deadlines will be impacted by this extension of time. The parties have previously stipulated to two extensions for Swarm to respond to Juniper’s original complaint (Dkt. Nos. 16-17) and an extension for Juniper to respond to Swarm’s original motion to dismiss (Dkt. No. 21).

Accordingly, the parties respectfully request that the Court enter this stipulation.

1  
2 Dated: April 29, 2021

Respectfully submitted,  
By: /s/ R. William Sigler  
R. William Sigler  
*Counsel for Plaintiffs*  
*JUNIPER NETWORKS, INC. and APSTRA, INC.*

5  
6  
7 Dated: April 29, 2021

By: /s/ Suneel Jain  
Suneel Jain  
*Counsel for Defendant*  
*SWARM TECHNOLOGY LLC*

8  
9  
10  
11 Filer's Attestation: I attest that counsel for the parties have concurred in this filing.

12 /s/ R. William Sigler

13  
14 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

15 Dated:

/s/